

DRAFT

FUGITIVE DUST PLAN

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General:
We have not addressed
monitoring, record keeping, reporting
(State wants daily VEO's)

COAL HANDLING SYSTEM

15A(1) COAL CONVEYOR BELTS

Operating Description
Normal Operating Conditions:

The outside coal conveyors are enclosed on three side (sides & top) to prevent wind from blowing fugitive dust off the belts. Other conveyor belts are located inside buildings. As coal is discharged from Belts 1A, 1B, 2A, 2B, (4) (7) 8 and 10, a water spray header is available to dampen the coal. All points where coal is transferred from one belt to another are inside buildings. ~~Each~~ ^{Most} of these transfer points ~~is~~ ^{are} also equipped with a dust collector baghouse. These are emission points 7 through 16 in Appendix D of the Title V Operating Permit. Conveyor belts will be operated with dust collectors in service, except during dust collector breakdown or routine maintenance. ~~In these cases opacity will be periodically monitored to assure less than 20% opacity.~~

Water Only
at Reserve Reclaim
Not the Foam

Check
Functional
Check
Method

Normal and Upset Condition Levels of Action:

LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions

LEVEL 2: ^{Check Conveying System} Check Wet Suppression System for Proper Operation ^{Apply Water}

LEVEL 3: ~~Apply Water and Foam Suppression~~
Shut Down Belts Until Problem is Found and Corrected

Level 4: ⁵

15B COAL TRUCK RECEIVING

Normal Operating Conditions:

Description
The coal truck receiving system is out of service and is no longer used. We have not received any coal by truck since 1994. Coal that was received by truck is now delivered to one of several railroad loading facilities. ~~All coal received by Intermountain Generating Station is shipped by railroad cars.~~ Emissions are ^{currently} kept at zero by not operating the truck receiving system. Although the system is still in place and could be used, there are no plans to do so.

Coal received by train is unloaded inside the coal car unloading building. Emissions are controlled by four baghouse dust collectors (Emission Source 3,4,5 and 6 Appendix D, Title V Permit Application). Should operation of this system resume, fugitive dust can be controlled by the levels of action shown below.

Normal and Upset Conditions Levels of Action:

IF ~~not~~ Back in Service

LEVEL 1: No Action Required Due to Moisture Content of Coal or Weather Conditions

LEVEL 2: -Keep Coal Hopper Near Full For a Short Drop Through the Grating
~~Reduce Dumping Rate so Displaced Air from the Hopper Does Not Entrain Dust~~

LEVEL 3: ~~Pre~~ Wet Coal With the Water Truck ^{*While*} ~~Before~~ Unloading or While Unloading

LEVEL 4: Suspend Truck Deliveries ^{*from*} ~~Until Mines Owners Moisten Coal~~ *w/ dry Coal*

Normal Operating Conditions:

Coal received by train or truck can be sent directly to the boiler units to be used or stacked out at two different locations. Both of these areas (Active Reclaim Stacker or Reserve Reclaim Stacker) are equipped with telescopic chutes. These chutes are lowered to the top of the coal pile so the free fall of the coal is contained within the chute. Hanging at the bottom of the chute are pliable gum rubber belting strips. This belting comes in contact with the top of the coal pile. As the pile becomes higher and wider the belts push out and meet a *tilt Switch* ~~vertical lever~~. When this ~~lever is pushed off vertical so far it~~ *switch is tilted to a limit* it trips a switch to raise the telescopic chute. The belting stays close to the top of the coal pile to control fugitive dust.

When a strong wind is blowing (above 25 to 30 mph) lowering the chute could damage the equipment so the chute automatically retracts to the full-Up position. Most high winds occur in the afternoon. Coal deliveries are usually made at night or early in the morning the air is calm.

Normal and Upset Conditions Levels of Action:

LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions

LEVEL 2: *Check telescopic chutes*
Check Wet Suppression System for Proper Operation

LEVEL 3: ~~Use Active Reclaim Stacker for Short Fall Unloading~~

LEVEL 4: ~~Use Reserve Stackout With Telescopic Chute in Place~~
~~If Main Stacker in Unavailable During High Winds, Send~~
~~Coal Directly to the Units~~
~~Slow Train Unloading Speed to Half to Accommodate Unit Belts~~
~~Unhook Trains From Engine to be Unloaded Later~~

Split & Divert coal streams to units and most appropriate stack-out location

Normal Operating Conditions:

Coal can be reclaimed from either the active or reserve coal pile. Both systems draw off the bottom of the coal pile into underground tunnels. The active reclaim uses rotary plows to feed coal onto the belt ^{whereas} while reserve reclaim uses a vibratory feeder. Inlets to the feeders are kept covered with coal to ^{reduce} ~~prevent~~ fugitive dust emissions. Reclaimed coal is transferred to belts in underground tunnels which ^{reduce} ~~prevent~~ emissions to the environment. Active reclaim rotary plow feeders are equipped with wet suppression sprays to control dust. ~~There are also suppressions sprays at the end of Conveyor 7 and the beginning of Belt 8. (See Attached Diagrams).~~


The reserve reclaim system is much smaller. It is equipped with several dust pick up points connected to a dust collector baghouse (Emission Source 8, Appendix D Title V Permit). The reserve reclaim system also has wet suppression sprays to wet the coal as it is fed on the belt. (See Attached Drawing).

Normal and Upset Conditions Levels of Action:

LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions

LEVEL 2: -Check Wet Suppression Sprays to Assure Proper Operation
~~-Reclaim Slowed or Stopped Until Feeders are Covered with Coal~~

Maintain Seal or Alter ^{Feeder} ~~Flow~~ Operation
 LEVEL 3: -Reclaim Rate Slowed or Stopped Until Emission is Below 20% Opacity

Level 4  *can we slow down conveyors? No*

15E COAL ACTIVE PILE

Normal Operating Conditions:

The active ^{reclaim} coal pile is comprised of two sections, the active pile, just above the rotary plows and the working pile to the west. Coal placed on the active pile is damp with residual moisture from the mine or rain, ~~and with the wet suppression sprays on the conveyor system.~~ Coal from the active pile is ^{available for} ~~usually reclaimed and used within four days.~~ _{Immediate use.}

The Working pile is just west of the ^{Active Pile} ~~rotary plows~~. Coal deliveries vary; sometimes too much is delivered, sometimes too little. When there is a shortage the coal is pushed from the working section into the ^{active pile} ~~feeders~~. When more is delivered than can be used right away the coal is placed in the working section by extending the radial stacker boom to the west. This coal is leveled and compacted for future use.

Normal and Upset Conditions, Levels of Action:

LEVEL 1: No Action Required Due to Moisture and Weather Conditions

LEVEL 2: Active Area and Working Area Watered to Minimize Emissions

LEVEL 3: ^{change location, 2nd water truck} ~~Additional Water Applied to Active and Working Areas~~

LEVEL 4: Activity Relocated to Alternate Site Where Emissions are Less or Activity Suspended Until Conditions Allow Activity with Less Than 20% Opacity

15F COAL RESERVE PILE

Normal Operations:

The coal reserve pile is for long term storage of coal. This coal would be used only if Intermountain Generating Station was unable to receive coal for an extended time. ~~The active pile has approximately a 30 day supply of coal.~~ The coal in the reserve pile has been compacted and shaped in place for long term storage. The surface is ^{periodically} coated with a crusting agent to bind the coal particles together.

Normal and Upset Conditions Levels of Action:

- LEVEL 1: Coat Unused Coal ^{Reserve} Pile With Crusting Agent if Windblown Dust is Over 20% Opacity
- LEVEL 2: No Action Required If Weather Conditions and Residual Moisture are Good when Moving Unused Coal Pile With Scrapers
- LEVEL 3: Use Water Trucks to Wet Coal Being Moved
- LEVEL 4: Use Second Water Truck and Reduce Moving Speed

No Use

1. No Action
2. Water Truck
3. More Water
4. Recoat if Problem persistent & ongoing

Use

1. No Action
2. Add Water
3. Change Area
4. Use Different Equipment

LIMESTONE HANDLING SYSTEM

15A(3) LIMESTONE CONVEYOR BELTS

Normal Operating Conditions:

Limestone conveyor belts transport limestone from the truck unloading hopper to the Limestone Preparation Building. Outside conveyor belts are covered on three sides (sides & top) to prevent wind blown fugitive dust emissions. All transfer points from one belt to another are located in buildings or in underground tunnels. Each of the transfer points has a baghouse dust collector to control emissions. These are Emission Points 23, 24, 26, and 27 in Appendix D of the Title V Permit.

Allow for dust collector maintenance + breakdown
Normal and Upset Conditions Levels of Action:

LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions

check X Fer Systems for proper operation
LEVEL 2: ~~Reduce Tonnage Rate on Limestone Belts~~

LEVEL 3: -Shut Down the System Until Wind Conditions Permit Operation

~~Repair Mechanical Problems Before Operation Continues~~

15G LIMESTONE ACTIVE AND RESERVE PILES

Active Storage Silo
Reserve Pile

Normal Operating Conditions:

There is no longer an active limestone storage pile with its associated telescopic chute. The active limestone pile is now the limestone storage silo. This enclosed metal silo is filled through a fixed pipe and vented through a silo vent filter. (Emission Source 25, Appendix D of the Title V Permit).

The limestone reserve pile is located along the west side of the limestone storage silo. ~~Only limestone from one supplier is placed in the reserve pile. The contract limits the fines of 1/4" or less in the limestone to less than 20%.~~ Because most of the stones are large, all the fine material tends to fall down between the larger pieces, protected from the wind. Residual moisture from the mine or rain tend to make the fines stick together or to the larger pieces.

Normal and Upset Conditions Levels of Action:

LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions

LEVEL 2: *Minimize Activity on pile (pushing)*
Use a Fine Water Spray or Crusting Agent on the Reserve Limestone Pile

Level 3: *Stop pushing on Reserve Deliveries (Use Silo)*

15N LIMESTONE TRUCK RECEIVING GRATING

Normal Operating Conditions:

The system to receive limestone has been modified since the original Approval Order was issued. Limestone is hauled to the site in belly dump semi-trailers. Trucks drive over the limestone truck receiving grating. The limestone is dumped through the grating into the limestone receiving hopper. Burnley Baffles are installed beneath the grating which swing aside when solids are passing through and then close when the flow stops. In addition two baghouse dust collectors have been installed on the receiving hopper. These are Emission Sources 21 & 22, Appendix D of the Title V Permit. The Burnley Baffles keep the opening to the hopper small while the baghouse draws air from it. The air velocity at the hopper entrance is high to prevent dust from leaving the hopper. The grating is inside a drive-through building which also controls wind. *It is also common for us to dump on the ground from both suppliers*

Normal and Upset Conditions Levels of Action:

- LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions
- LEVEL 2: Slow Dumping Rate If Limestone Filling Rate into Hopper Exceeds Air Flow Capacity of Baghouse

This is a point source - Levels not necessary

15N(2) LIMESTONE TRUCK RECEIVING (RESERVE)

Normal Operating Conditions:

Limestone that is designated for the reserve limestone pile is not unloaded in the truck receiving grating. This limestone is unloaded on the ground just west of the limestone storage silo. Belly dump trucks slowly drive along the west side of the silo, placing the limestone in windrows next to the reserve pile. The top of the windrows is about even with the belly dump openings (about 2 feet high). Limestone does not drop to the ground, but flows out of the truck. Little dust is generated this way. A dozer or front-end-loader pushes the limestone onto the reserve pile. ~~Only limestone with over 80% 1/4" plus, is unloaded to the limestone reserve pile.~~ 7.

Normal and Upset Conditions Levels of Action:

LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions

LEVEL 2: -Discontinue Unloading to Reserve Pile
-Unload Remaining Limestone Through Active Limestone Receiving Grating
-Unload to Reserve Pile Only When Conditions will Not Cause Dust

2:

3: Reduce Deliveries

4: Stop Deliveries

ACTIVE LIMESTONE RECLAIM AND RESERVE RECLAIM

Normal Operating Conditions:

Active limestone reclaim is drawn from the Limestone Storage Silo into an underground feeder. This feeder is equipped with a baghouse dust collector (Emission Source 24, Appendix D of the Title V Permit). No fugitive dust is created from this operation.

Point
Source

The reserve reclaim grating leads to an underground feeder located along the west side of the limestone storage silo. This is under the reserve limestone pile. Any dust from this feeder is collected by the baghouse above (Source 24). If the grating under the reserve limestone pile becomes exposed it could create dust. The dozers and front-end-loaders will keep the grating covered. Dust is controlled by pushing the limestone onto the reserve pile, instead of picking it up and dumping it.

Hopper

partially filled

Normal and Upset Conditions Levels of Action:

(Reserve Reclaim Only)

LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions

LEVEL 2: -Stop Reclaiming Limestone From Reserve Pile Till
Grating is Covered hopper partially filled
-Operate Heavy Equipment at Slower Speed

LEVEL 3: Shutdown reserve reclaim Operation Till Dust Can be Controlled

4

No revision?

EMERGENCY LIMESTONE RECLAIM

Normal Operating Conditions:

An emergency system is in place should the two reclaim systems or the conveyors fail for an extended time. Limestone from the reserve pile will be loaded into belly or dump trucks and placed on the concrete slab along the west side of the Limestone Preparation Building. A front-end-loader will place the limestone on a portable conveyor. This conveyor can transport the limestone to the top of the Limestone Prep Building ^{to} and fill the limestone silos inside. ~~This emergency system has been used only once.~~

Normal and Upset Conditions Levels of Action::

LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions

LEVEL 2: Apply a Fine Water Spray to Limestone ^{being loaded, then feed it.} Only if ^{-?} ~~Limestone is Constantly Being Fed to the Ball Mills and Will Not Have Time to Stick Together~~

FLY ASH/SCRUBBER SOLIDS SYSTEM

15H FLY ASH HANDLING/SCRUBBER SLUDGE MIXING

Normal Operating Conditions:

Fly ash is the fine ^{ash from} burned coal that is carried by airflow out of the boiler. Fly ash is collected in the main fabric filters and is pneumatically transferred to the fly ash storage silos located at the Sludge Conditioning Building. These silos are equipped with bin vent filters (Emission Sources 33 & 34, Appendix D of the Title V Permit). Fly ash can be sent one of three routes:

1. Processed with Scrubber Sludge: The fly ash is mixed with scrubber sludge or water in the pug mill. Scrubber sludge is a slurry of 40 to 90% calcium sulfate (gypsum) and water. This becomes conditioned sludge for disposal. See Combustion By-Products Section.

2. Sold to ^{outside Vendor} ~~Pozzolanic~~: This company purchases fly ash from Intermountain Generating Station to be used as a ~~cement~~ concrete additive. The fly ash is transferred to their system through closed piping.

3. Loaded on Trucks for Transport: Truck loading of fly ash is accomplished by telescoping dry discharge chutes. Chutes have donut shaped cross sections; fly ash falls down the hole. The donut section is connected to an exhaust fan which discharges back into silos with bin vent filters. Only closed hopper-type trucks are loaded. This system is in place, but not normally used because ~~Pozzolanic loads the trucks.~~

Point Source
INFO
only

Point Source
for Info
only

Need to insert railcar
situation

Normal and Upset Conditions Levels of Action:

LEVEL 1: No Action Required as Normal Operating Controls Have Opacity Less Than 20%

LEVEL 2: -Adjust Process to Use More Scrubber Sludge or Water -
~~Shut Down System to Determine Cause and Repair Before~~
~~Continuing to Transport Flyash~~

LEVEL 3: Shut Down System to Determine Cause and Repair Before Continuing to Process Flyash

15A(2) COMBUSTION BY-PRODUCTS (CONDITIONED SLUDGE) CONVEYORS

Normal Operating Conditions:

The outside combustion by-products conveyors are enclosed on three side (sides & top) to prevent wind from blowing fugitive dust off the belts. All points where combustion by-products are transferred from one belt to another are inside buildings. The combustion by-products normally consist of between 10% and 30% water. This moisture means there is little fugitive dust from the conveyors.

Normal and Upset Conditions Levels of Action:

- Level 1: No Action Required Due to Moisture Content or Weather Conditions
- Level 2: Adjust Sludge Conditioning Building Operating Procedures to Produce Wetter Sludge
- LEVEL 3: Shut Down Combustion By-Products Conveyor Belts Till Problem is Fixed

15L COMBUSTION BY-PRODUCTS STOCKPILE

Stacker 2 Normal Operating Conditions:

At the end of the combustion by-products conveyor belt is a radial stacker. As the conditioned sludge is produced it is stockpiled by the radial stacker in the Combustion By-Product Landfill area. Monday through Friday, the stockpile of conditioned sludge is loaded into belly dump trucks to be hauled to the Combustion By-Products Landfill. Dust is not usually a problem because the sludge has 10% to 30% moisture by weight. Once conditioned sludge is stockpiled, ^{typically} only one to three days pass before it is hauled to the landfill. The residual moisture in the conditioned sludge controls dust.

Normal and Upset Conditions Levels of Action:

LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions

LEVEL 2: ~~Wet Stockpile with Water Spray Located on the Radial Stacker~~ *Change the mix*

LEVEL 3: Wet Stockpile With ~~one or both 8000 Gallon Water Trucks~~

LEVEL 4: Wet Stockpile While ^{Loading} ~~Hauling~~ to Combustion By-Products Landfill

No Number? EMERGENCY COMBUSTION BY-PRODUCTS RADIAL STACKER #1

Stacker 1 Normal Operating Conditions:

If the main conveyor belt is down for an extended time, conditioned sludge may be stockpiled at the emergency combustion by-products radial stacker. This stacker is located next to Conditioned Sludge Transfer Building 1. The sludge doesn't have to travel so far on the belt so it tends to be wetter.

Level 1: No Action Required Due to Moisture Content or Weather Conditions

LEVEL 2: *Change the mix - wetter*
~~Wet Stockpile With one or both 8000 Gallon Water Trucks~~

LEVEL 3: ^{Loading} ~~Wet Stockpile While Hauling~~ to Combustion By-Products Landfill

15M COMBUSTION BY-PRODUCTS LANDFILL

Normal Operating Conditions:

The Combustion By-Products Landfill is a 300 acre site on the north end of our property. A mound 40 feet high is the disposal site for 35 years of coal ash and scrubber sludge. The conditioned sludge is placed on the landfill by belly dump trailers pulled by semi-trucks. As the trucks drive down the working face of the pile they deposit a windrow of conditioned sludge. Road graders spread the windrows in 6" to 18" thick layers. Residual moisture usually controls any dust problem. Water trucks also spray the Combustion By-Products Landfill. Graders, water trucks and haul trucks driving over the area, compact the conditioned sludge. In the combustion by-products landfill, moisture in the compacted sludge tends to make it set up like wet cement. This usually controls dust on the working face of the Combustion By-Products Landfill.

When the finished contour of a section of the pile is reached, a layer of bottom ash is placed on the Combustion By-Products Landfill. Bottom ash is the same material but larger in size. This material fell to the bottom of the boiler, instead of being carried out with the air stream. Bottom ash is recovered from the bottom ash pond where it is hydraulically transported. Size ranges from sand to gravel. Wind is less likely to cause a dust problem with bottom ash than fine fly ash and sludge. When a section is completed, soil is placed on the Combustion By-Products Landfill for reseeding. When the first cell is completed, topsoil is not stockpiled, but placed directly on a cell to be reseeded. This avoids handling the soil twice which could cause more dust.

Normal and Upset Conditions Levels of Action:

LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions

LEVEL 2: Use 8000 Gallon Water Truck to Water Active Area

LEVEL 3: Use Additional Water Truck

TRANSPORTATION AND HAUL ROADS

15I COAL AND LIMESTONE HAUL ROADS

Normal Operating Conditions:

Coal and limestone delivered by truck use the same road. (See attached map). We have not received coal by truck since 1994. There are no plans as of now to resume coal shipments by truck; however, this could change.

Limestone is delivered by semi-truck and trailer. We average approximately forty trucks a week. From highway 174, the entire coal and limestone haul road is paved. Speed limit on this road is 35 mph to lessen dust created by truck tires.

25?

Normal and Upset Conditions Levels of Action:

LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions

LEVEL 2: Wash Down the Road With the Water Truck

15K COMBUSTION BY-PRODUCTS HAUL ROAD

Normal Operating Conditions:

The Combustion By-Products Stockpile is transported via the Combustion By-Products Haul Road (See attached map) ^{to} the Combustion By-Products Landfill. This is a gravel road. In the winter months residual moisture keeps dust under control. To control dust from truck tires in the summer, the water truck wets down the road several times each day sludge is hauled. The residual moisture in the conditioned sludge controls blowing dust from the top of the belly dump trucks.

Normal and Upset Conditions Levels of Action:

Level 1: No Action Required Due to Moisture Content or Weather Conditions

LEVEL 2: Apply Water to Haul Road With the Water Truck(s)

LEVEL 3: Reduce Traffic Volume by Traveling Back and Forth Along the Same Road Instead of Making a Loop - One Road is Easier to Keep Wet

LEVEL 4: Postpone Hauling Combustion By-Products Until Conditions Improve

OTHER ACCESS ROADS ON-SITE

Normal Operating Conditions:

We have approximately 50 miles of two lane roads or parking lots on-site. About 22 miles are paved with asphalt or concrete to control dust. There are 11 miles of well used gravel roads which are coated with dust control agent ~~each year~~. We have used calcium or magnesium chloride. The rest of the roads are not often used (f.e. ^{such as} old roads from construction). Some of these run parallel to coated or paved roads. Low speed maintained on these gravel roads keeps dust to a minimum.

Normal and Upset Conditions Levels of Action:

Level 1: No Action Required Due to Moisture Content or Weather Conditions

LEVEL 2: -Clean Up Material Spilled on Paved Roads That is Creating Dust
-Divert Traffic Until Cleanup is Complete

LEVEL 3: Reroute or Stop Traffic Until Conditions Improve

Speed Limit

how many or sqft

No number?

SANITARY LANDFILL HAUL ROAD

Normal Operating Conditions:

Paved or treated gravel roads are used to transport dumpsters of waste to the Sanitary Landfill. The haul road (1/3 mile long - See attached map) is covered with Bottom Ash which has particles ranging in size from sand to gravel. Bottom Ash over fine soil creates less dust than dirt spread over these roads.

Normal and Upset Conditions Levels of Action:

- LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions of Bottom Ash Road
- LEVEL 2: Reduce Speed to Less Than 15 Miles Per Hour and Use Water Truck to Wet Down the Sanitary Landfill Haul Road to Achieve Less than 20% Opacity
- LEVEL 3: Suspend Dumpster Hauling Till Road or Weather Conditions Permit Operation Without Exceeding the 20% Limit

ADDITIONAL SYSTEMS

GUZZLER TRUCK DUMPING

Normal Operating Conditions:

General plant cleanup is accomplished by a vacuum truck which can pick up wet or dry material. Once the truck is full it is dumped in the appropriate location. Wet material causes no dust; however, if the material is dry, dust may be a problem.

Normal and Upset Conditions Levels of Action:

- LEVEL 1: No Action Required Due to Moisture Content or Weather Conditions
- LEVEL 2: Spray Water From the Water Truck on the Back of the Guzzler Truck Load
- LEVEL 3: -Vacuum Up the Water Along With the Dry solids - When Water is Mixed With Dry Solids, the Material Can Be Dumped Without Creating Dust
- LEVEL 4: Find Another Method of Cleanup if Dust Results

SANITARY LANDFILL OPERATION

Normal Operating Conditions:

Intermountain Power Service Corporation operates a Class III Industrial Landfill (non-municipal) to dispose of common refuse. Typical materials disposed of are office wastes, lunch wastes, paper, wood, plastic and other non hazardous waste as defined by RCRA. Landfill operations consist of digging trenches for waste disposal, covering waste after ~~daily~~ operation and final filling and leveling of waste cells after they are full.

Fugitive dust is controlled by using a large tracked hoe to dig the trenches. Trenches are dug before they are needed, when conditions permit activity without a fugitive problem. This is when residual moisture and low wind conditions are present.

~~Daily~~ covering of waste is done by trackhoe or dozer. Soil is placed or pushed (not dumped) over the waste with the trackhoe or dozer. A dozer performs the final leveling of soil not used to cover waste and also spreads a thick layer of soil over the cell so revegetation can take place. This activity is accomplished when conditions permit operation without creating dust over 20% opacity.

Normal and Upset Conditions Levels of Action:

LEVEL 1: No Action Required Due to Moisture and Weather Conditions, Along With Operating Procedures

LEVEL 2: Terminate Activities Which Can Wait for Better Conditions

Activities Which Need to Proceed (Daily Covering of Waste) will Require That the Soil be Wet Before Continuing

LEVEL 3: Stop Activities Until a Lower Level of Action Will Control Fugitive Dust